

**CURRENTLY PENDING DISCOVERY REQUESTS
BY DEFENDANT-COUNTERCLAIMANT LANGRICK
TO THIRD PARTIES
(As of March 23, 2019)**

Confidential Health Records of Monica Morrison From Hospitals and Other Mental Healthcare Facilities:

Dartmouth College Counseling Center [limited to “Protected Health Information (PHI),” including *all* counseling treatment and medical management records]

Lori B. Bonhert, MS, LMHC [complete health record including mental health records, but excluding alcohol/drug abuse treatment records, communicable diseases or genetic information]

Mount Sinai/Beth Israel [entire inpatient record including psychiatric records]

New Horizon Counseling Center [complete health record including mental health records, but excluding alcohol/drug abuse treatment records, communicable diseases or genetic information]

New York Presbyterian/Weill Cornell Hospital [CATEGORIES OF RECORDS REQUESTED: (1): HIPPA release forms; (2): hospital admission forms; (3): mental health, psychiatric, psychotherapy records; (4): mental health testing, treatment – all such records requested on CD]

Personnel Records From Ms. Morrison’s Previous Employers:

Simon & Schuster
Insider Inc.
Kelly Services Inc.
Lambent Services
Maxi Cohen Studio
Working Voices
Chertoff Group

[CATEGORIES OF RECORDS REQUESTED: (1) *complete* personnel/human resources file; (2) *all* disciplinary records; (3) *all* complaints against Monica Morrison; (4) *all* non-privileged documents relating to any litigation, arbitration or mediation as between Ms. Morrison and her employer; (5) *all* documents related to Ms. Morrison’s termination, resignation, separation or severance from the employer; and (6) *all* documents related to any complaints or allegations of misconduct by Ms. Morrison against her employer or its officers or her coworkers.]